

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BRADLEY AND LAURIE MOWCHAN,

*Plaintiffs,*

V.

LIBERTY INSURANCE  
CORPORATION,

*Defendant.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 4:22-cv-00940

---

**NOTICE OF SERVICE OF PLAINTIFFS' RESPONSE TO INITIAL DISCOVERY  
PROTOCOLS**

---

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiffs Bradley and Laurie Mowchan, and shows the court that on May 6, 2022, Plaintiffs emailed *Plaintiff's Responses to Initial Discovery Protocols* and bates-labeled production documents to Defendant in the above referenced matter.

Respectfully Submitted,

By: /s/ Jay Scott Simon

Chad T. Wilson  
Southern Bar No. 2246983  
Bar No. 24079587  
Jay Scott Simon  
Southern Bar No. 31422  
Bar No. 24008040  
455 Medical Center Blvd., Suite 555  
Webster, Texas 77598  
Telephone: (832) 415-1432  
Facsimile: (281) 940-2137

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on May 6, 2022, I electronically transmitted this document to the Clerk of Court using the CM/ECF system for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to defendant(s) counsel of record.

THOMPSON, COE, COUSINS & IRONS, L.L.P.

J. Mark Kressenberg  
[mkressenberg@thompsoncoe.com](mailto:mkressenberg@thompsoncoe.com)  
Christopher H. Avery  
[cavery@thompsoncoe.com](mailto:cavery@thompsoncoe.com)  
One Riverway, Suite 1400  
Houston, Texas 77056  
Telephone: (713) 403-8210  
Facsimile: (713) 403-8299

ATTORNEYS FOR DEFENDANT

/s/ Jay Scott Simon